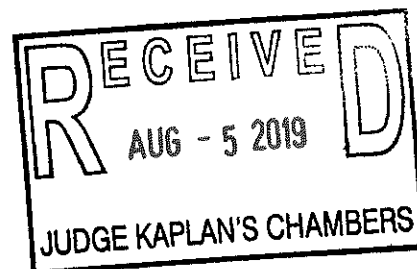
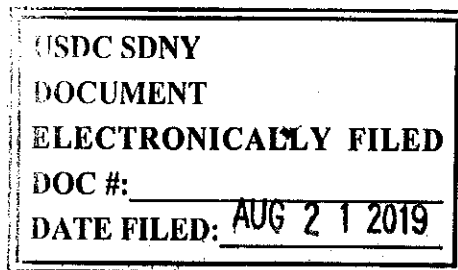


WILLKIE FARR & GALLAGHER LLP

787 Seventh Avenue
New York, NY 10019-6099
Tel: 212 728 8000
Fax: 212 728 8111



August 5, 2019

BY EMAIL

MEMO ENDORSED

The Honorable Lewis A. Kaplan
United States District Court for the
Southern District of New York
Room 1940
500 Pearl Street
New York, NY 10007

Re: *United States v. James Gatto, et al. (Case No. 17-CR-686)*

Dear Judge Kaplan:

I represent Defendant James Gatto in the above-captioned matter. Mr. Gatto's current conditions of release restrict his travel to the Southern and Eastern Districts of New York, the Western District of Washington, the District of Oregon, and the District of New Jersey, except upon application to the Court.

Mr. Gatto is currently looking for work and he been successful at obtaining various short-term opportunities consulting for various professional basketball events across the country. Mr. Gatto is optimistic that he will continue to be hired for these short-term assignments, especially as the basketball season starts up, but they require him to travel throughout the United States, as basketball is played throughout the country. Mr. Gatto is therefore respectfully seeking a modification to his current conditions of release, which would allow him to travel throughout the continental United States without advance permission from this Court. Mr. Gatto would still be obligated to inform Pretrial Services of any travel plans and to send Pretrial Services an itinerary of each trip in advance. We have conferred with both Pretrial Services and the Government and both have indicated that they have no objection to this modification of Mr. Gatto's current conditions of release.

Mr. Gatto therefore respectfully requests that the Court modify his conditions of release to permit him to travel within the continental United States, upon advance notice to Pretrial Services and the provision of an itinerary to Pretrial Services.

Respectfully submitted,

Casey E. Donnelly

MEMO ENDORSED

NEW YORK WASHINGTON HOUSTON PARIS LONDON FRANKFURT BRUSSELS MILAN ROME

in alliance with Dickson Minto W.S., London and Edinburgh

LEWIS A. KAPLAN, USDC
8/17/19

30680603.1

cc: (by email)

William W. Wilkins

Mark C. Moore

Andrew A. Mathias

(Counsel for Defendant Merl Code)

Steven Haney

(Counsel for Defendant Christian Dawkins)

Edward Diskant

Robert Boone

Noah Solowiejczyk

Aline Flodr

Eli Mark

(U.S. Department of Justice)

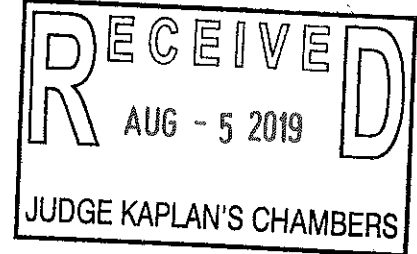


U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

August 5, 2019



The Honorable Lewis A. Kaplan
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

Re: United States v. James Gatto et al., 17 Cr. 686 (LAK)

Dear Judge Kaplan:

The Government writes in connection with the application of defendant James Gatto to modify the current conditions of his release to allow him to travel within the continental United States, upon advance notice to Pretrial Services and the provision of an itinerary to Pretrial Services. (*See* Dkt. No. 336.) The defendant, through counsel, has informed the Government that he has notified and obtained the consent of his pretrial services officer for the proposed modification of his release, and in light of that, the Government similarly has no objection to the request.

Respectfully submitted,

AUDREY STRAUSS
Attorney for the United States, Acting Under
Authority Conferred by 28 U.S.C. § 515

By: /s/
Edward B. Diskant/Noah Solowiejczyk/
Eli J. Mark/Aline R. Flodr
Assistant United States Attorneys
(212) 637-2294/2473/2431/1110

Cc: Defense counsel (by email)